BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

In the Matter of)		
)		
Implementation of the Pay Telephone)	CC Docket No. 96-12	8
Reclassification and Compensation Provisions)		
Of the Telecommunications Act of 1996)		
)		
Petition of the Independent Payphone Association)		
of New York, Inc. to Pre-empt Determinations of)		
the State of New York Refusing to Implement the)		
Commission's Payphone Orders, and For a)		
Declaratory Ruling)		

REPLY COMMENTS OF THE INDEPENDENT PAYPHONE ASSOCIATION OF NEW YORK, INC.

Independent Payphone Association of of New York, Inc.

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Dated: Albany, New York February 1, 2005